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U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION

AND

STATE OF MONTANA
DEPARTMENT OF HIGHWAYS

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FINAL
ENVIRONMENTAL STATEMENT

FOR

I 15-1(5) 51 Dillon South
F 241 (20) Dillon I-Connection

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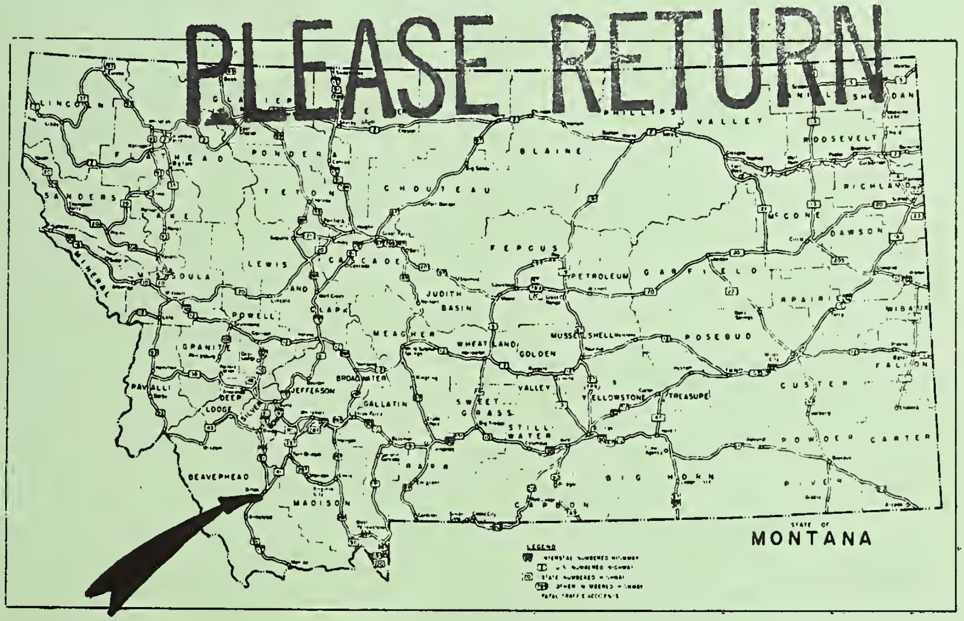

THIS HIGHWAY IMPROVEMENT IS PROPOSED FOR FUNDING UNDER TITLE 23, U.S.C. THIS STATEMENT FOR THE IMPROVEMENT WAS DEVELOPED IN CONSULTATION WITH THE FEDERAL HIGHWAY ADMINISTRATION AS IS SUBMITTED PURSUANT TO:

42 USC 4332 (2) (C)

Date 5-7-74

H.J. ANDERSON
DIRECTOR OF HIGHWAYS

By Jack R. Beckert
Administrator, Engineering Division

APPROVED AND ADOPTED BY FHWA

Date ______________ By ______________
Federal Highway Administration-Regional Engineer

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SUMMARY SHEET

I. TYPE OF ACTION

(X) Administrative
(X) Environmental Statement
( ) Combination Environmental/Section 4(f) Statement
( ) Legislative
(X) Final

II. PROJECT DESCRIPTION

The I-15 Dillon South project would be a new four-lane divided Interstate highway that begins at a point 5.3 miles south of the city of Dillon and extends north 5.6 miles to Park Street on the west edge of Dillon. The separation between the northbound and southbound roadway centerlines would be 70 feet for about a mile of roadway and then would be a 100 feet for the remaining 4.6 miles. Each roadway would have two 12 foot driving lanes, a ten foot outside shoulder and a four foot inside shoulder.

Interchanges are proposed at the Jackson Road (Secondary 278) and about one mile south of Dillon (South Dillon Interchange).

This project would have full control of access and would include access structures, frontage roads and access roads.

Drainage and irrigation facilities have been designed to perpetuate existing drainage and irrigation. New right-of-way would be required for this project.

The F-241(20) Dillon-I Connection project would be a new primary road connection to provide an ingress and egress route between the South Dillon Interchange and the city of Dillon. This primary road would be approximately 0.8 miles long and would connect to Atlantic Street on the south edge of Dillon. This roadway would be 44 feet wide with two 12 foot wide driving lanes and two 10 foot wide shoulders. This would be a limited access highway.

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Another short road would realign and connect the present U.S. 91 with Atlantic Street in Dillon. The width of this roadway would be 36 feet with two 12 foot wide driving lanes and two six foot shoulders.

New right-of-way would be required for the Dillon-I Connection.

III. ENVIRONMENTAL IMPACTS

There would be no displacement or relocation of families or individuals as a result of the interstate project. The F-241(20) Dillon-I Connection project would require the relocation of two occupied rental trailers and one non-profit organization consisting of a day care and pre-school center.

There would be no enhancement of work, school, recreation or religious activities as a result of these projects other than that the proposed facility would lessen travel time for those individuals who live outside Dillon and participate in these activities by commuting to Dillon.

These projects would provide a safe and efficient transportation facility for the traveling public.

There are no section 4(f) lands involved on the projects. The main ingress and egress route on the south side of Dillon would be changed from U.S. 91 to the Dillon-I Connection. U.S. 91 would be realigned to join Atlantic Street in Dillon.

This highway follows the Beaverhead Valley which consists predominately of hay and pasture land. Some of this land would be taken out of use by these projects, as new right-of-way would be required.

The character of the area would be altered by the intrusion of the highway on this area.

Severed ranches would be reconnected with underpasses where justified.

Bridge crossings of the Beaverhead River and the Poindexter Slough are designed to preserve the existing stream banks and channels.

IV. ALTERNATIVES

One alternative is not to build this interstate project. This would not comply with the National Highway Defense Act and would leave a gap in the Interstate Highway System. If the Interstate were not built, there would be no reason for the Dillon I-Connection.

About two and a half miles of the proposed alignment has been shifted west of a former alignment because the former alignment involved channel changes and numerous crossings of the Beaverhead River and Poindexter Slough, which would have been unfavorable to the fish habitat. The poorer soils encountered through this area also contributed significantly to the change in alignment. There has been close coordination between the Montana Department of Highways, the Montana Department of Fish and Game, the City, County, and many others relative to this line shift. The present interstate alignment does not involve any channel changes.

An alternate for the I-Connection to enter Dillon on Pacific St. was brought up but the businessmen prefer Atlantic St. as it is existing U.S. 91 and the majority of businesses are located in this area.

V. FEDERAL, STATE AND LOCAL AGENCIES AND OTHER ORGANIZATIONS FROM WHICH COMMENTS WERE REQUESTED

* Indicates agencies from which comments were received.

County Commission
Beaverhead County
Dillon, Montana 59725

U.S. Forest Service
Federal Building
Missoula, Montana 59801

Rear Admiral J.J. McClelland
Cmdr. 13th District U.S. Coast Guard
618 2nd Avenue
Seattle, Washington 98104

Office of Civil Defense
Federal Regional Center
Bothell, Washington 98011

Corps of Engineers
Missouri River Division
U.S. Army Engineer Division,
Missouri River
P.O. Box 10 (Downtown Station)
Omaha, Nebraska 68101

Dept. of Health, Education and
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9017 Federal Office Building
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Denver, Colorado 80202

Dept. of Housing and Urban
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Mr. Lawrence M. Jakub
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Honorable Raymond Lynch
Mayor
City of Dillon
Dillon, Montana 59725

School Board
Dillon, Montana 59725

Agricultural Stabilization and
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Postmaster
Dillon, Montana 59725

Dept. of Health & Environmental Sciences
Helena, Montana 59601

Dept. of Intergovernmental Relations
Planning and Economic Development
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Helena, Montana 59601

* Environmental Quality Council
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Director
Statewide Archaeological Survey
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Economic Development Administration
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Denver, Colorado 80202

Governor's Office
Capitol Station
Helena, Montana 59601

* Environmental Protection Agency
Room 916 Lincoln Tower
1860 Lincoln Street
Denver, Colorado 80203 (5 copies)

* Ass't Secretary
Program Policy Director
Environmental Project Review
Dept. of Interior
Washington, D.C. 20240 (9 copies)

Office of Emergency Preparedness
Region 8 Office
7200 W. Alameda Avenue
Denver, Colorado 80226

Dept. of Agriculture
Dr. T.C. Byerly
Office of Secretary
Washington, D.C. 20250

Geological Survey
Water Resources Division
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Soil Conservation Service
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Helena, Montana 59601

* Montana Dept. of Fish & Game
Division of Environment & Information
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Helena, Montana 59601 (2 copies)

* Dept. of Intergovernmental Relations
Aeronautics Division
Municipal Airport
Helena, Montana 59601

Dillon Canal, Inc.
P.O. Box 1024
Dillon, Montana 59725

Documents Department
Montana State Library
930 E. Lyndale
Helena, Montana 59601 (20 copies)

* Office of the Assistant Secretary
of Commerce
U.S. Department of Commerce
Washington, D.C. 20230

VI. DATE DRAFT STATEMENT MADE AVAILABLE TO C.E.Q.

The draft statement was made available to the C.E.Q. on August 13, 1973.

FINAL STATEMENT

The following is a Final Environmental Impact Statement for Projects I-15-1(5)51, Dillon South, and F-241(20), Dillon I Connection.

I. PURPOSE

The I-15 Dillon South project is part of the system of Interstate and Defense highways as delineated under the Highway Act of 1956. The purpose of the Interstate system is to provide a modern highway system to serve the ground transportation needs of the Nation as a whole. The purpose of the I-15 project is to complete this portion of the Interstate highway system, thus providing a safe and efficient transportation facility.

The purpose of the F-241(20) Dillon-I Connection project is to provide an additional connecting highway between the city of Dillon and the Interstate highway.

II. DESCRIPTION OF THE PROJECT

DILLON SOUTH

The I-15 Dillon South project would be a new four-lane divided Interstate highway that begins at a point 5.3 miles south of Dillon at the terminal point of project I-15-1(36)51, Pipe Organ North, and extends north 5.6 miles to just north of Park Street on the west edge of Dillon, the beginning point of project I-15-1(49)62, Dillon North. The horizontal alignment of this project traverses west of and approximately parallel to existing U.S. 91 and the Union Pacific Railroad. For the first 2.0 miles the alignment is adjacent to U.S. 91, and then varies from approximately 2000 to 3000 feet from U.S. 91 for the remaining 3.6 miles. The distance between roadway centers would be 70 feet for about the first mile of the project and 100 foot centers would be used for the remainder. The entire alignment traverses over relatively flat land.

Traffic data for this project is as follows:

Average Daily Traffic	(1967)	1207
Average Daily Traffic	(1993)	3550
Design Hourly Volume		450
Directional Distribution		55%--45%
Percent Trucks		16.7%
Design Speed		70 M.P.H.

The project is designed to current Interstate Standards. It would be a four-lane divided facility, two lanes in each direction, with 12 foot wide driving lanes, ten foot outside shoulders and four foot inside shoulders. The maximum grade is 3% with the majority of the project on a 1% or less grade. Curves would be no sharper than $3^{\circ}30'$.

Two interchanges are proposed for this project: Jackson Road Interchange and South Dillon Interchange.

A 24 foot frontage road with a bituminous surface is proposed on the west for about 3700' near the beginning of the project. It would connect the existing frontage road west of the present interstate with the county road that connects with Montana 278 west of the proposed Jackson Interchange. The existing county road would be upgraded between connection points.

Access would be controlled throughout the length of the project. Structures are proposed just north of the Poindexter Slough crossing, providing ranch access under the Interstate. A short section of access road is proposed west from the South Dillon Interchange for ranch access to land west of the Interstate. Local traffic would be served by frontage roads, existing U.S. 91, and the two Interchanges.

Realignment of U.S. 91 east of the Jackson Interchange is proposed, as U.S. 91 would be obliterated by the interchange ramps. This realignment would be about 2400 feet long.

New prestressed concrete bridges are proposed at the following locations: Jackson Interchange, Beaverhead River, Poindexter Slough, Access Road Separation, and South Dillon Interchange.

Drainage and irrigation facilities have been designed to perpetuate existing drainage and irrigation.

Right-of-way would have to be acquired for this project. The average width of this right-of-way would be about 350 feet, totalling approximately 240 acres. Acquisition was in progress on the former alignment and as a result approximately 21 acres of right-of-way has been purchased to be used for construction of this project.

DILLON-I CONNECTION

A 44 foot paved primary road connection is proposed to provide an ingress and egress route between the South Dillon Interchange and Dillon. This primary road would be approximately 0.8 mile long and would connect to Atlantic Street on the south edge of Dillon. This would be a limited access highway. Another short road is proposed to connect the present U.S. 91, where it enters Dillon, with Atlantic Street.

Traffic data for this project is as follows:

Average Daily Traffic (1967)	1013
Average Daily Traffic (1993)	3050
Design Hourly Volume	380
Directional Distribution	55%-45%
Percent Trucks	16.7%
Design Speed	50 M.P.H.

The roadway would be 44 feet wide with two 12 foot wide driving lanes and two 10 foot wide shoulders. The maximum grade is 4.5%. Maximum degree of curvature is $5^{o}30'$. Curb and gutter are proposed for about 700' at the entrance to Dillon. This roadway would be structured over the Union Pacific Railroad and Blacktail Creek.

Access to the Dillon-I Connection would be limited so the number of approaches would be held to a minimum.

New right-of-way would be required for this project with an average width of about 240 feet, totalling approximately 24 acres.

It is proposed to alter the present U.S. 91 connection to Dillon

on the south side of Dillon with another short connecting road. It is proposed to close that portion of present U.S. 91 between Chapman and Poindexter Streets, thus eliminating the two dangerous Y-intersections at Chapman Street and U.S. 91 and Atlantic Street and U.S. 91. U.S. 91 would then be routed up Chapman Street where it intersects with Atlantic Street at right angles. The proposed width of the connecting road would be 36 feet with two 12 foot wide driving lanes and two six foot shoulders. Integral curb and gutter is proposed for this section with 40 foot radius curb returns at the intersection of Chapman and Atlantic Streets. The 40 foot radius would allow the movement of a semi-trailer truck around the corners of the intersection. This intersection does not warrant traffic signals.

III. DESCRIPTION OF EXISTING ENVIRONMENT

A. Human Resources

Beaverhead County had a total population of 8,147, 1970 Census. The city of Dillon is the County Seat with a population of 4,548, also 1970 Census. The total population of Beaverhead County has increased 993 people in the last decade, 1960 to 1970. Of this, only 3.3% was in the rural areas. The 1970 Census showed the average per capita income of Beaverhead County to be $2,640 as compared at that time to $2,943 state wide. Unemployment rate in Beaverhead County is reported at 7½%.

B. Physiography and Geology

The Interstate highway alignment traverses the flood plain of the Beaverhead River. The depth to river gravels in this wide flood plain area increases rapidly from the beginning of the project to the north. North of the junction with the highway to Jackson (Secondary 278) depths to gravel vary considerably from 0.5 feet to ten feet. For all but about the first mile of the project, ground water is at the surface to three feet below. Numerous springs and sloughs are scattered throughout this area. Surface soils in the slough area are typically peats, organic

silts, and loose, fine sands. Due to the presence of springs, sloughs, high water table, and various depths of organic material, drainage would be given special consideration. Some undesirable material would be subexcavated, and the embankment material for this project would be constructed with granular material.

The Interstate highway would cross the Beaverhead River and Poindexter Slough. The Dillon-I Connection would cross Blacktail Creek.

C. Land Use

The total land area in Beaverhead County is 3,553,640 acres, of which 47.6% consists of farms and ranches. Agriculture is the main industry followed by mining, recreation and lumbering. All agriculture is livestock oriented with the exception of about 5,000 acres of winter wheat, about 400 acres of seed potatoes and about 2,000 acres of malting barley. Alternatives to the present land use are few. Thirty eight and one-half percent of the total county area is National Forest, 31.0% Bureau of Land Management, 9.4% State owned land, 0.2% water area, 0.1% Bureau of Reclamation, 0.9% Red Rock Land Refuge, with the remaining 19.9% being tax assessed lands and roadways.

D. Fish and Wildlife

Brown trout, rainbow trout, whitefish, cottus, suckers and dace are found in the Beaverhead River, Poindexter Slough and Blacktail Creek. Brook trout are also found in Blacktail Creek. The Beaverhead River is famous for its excellent brown trout fishing. Poindexter Slough offers excellent fishing and is also known to be excellent spawning water. Blacktail Creek supports a good trout population and is relatively accessible to youngsters and adults who desire fishing close to town. Duck and goose hunting along the Beaverhead River and its tributaries is considered very good.

Whitetail deer and mule deer feed on the pasture lands along the river. According to the Department of Fish and Game, there are no known

deer migratory routes within this project. Pheasants, fur bearers, small non-game animals and birds are also found in the valley.

E. Vegetation Resources

The valley consists predominately of subirrigated hay and pasture land. The water table varies from surface water to three feet below natural ground. The area along the Beaverhead River is wooded mainly with snowberry shrubs, cottonwood trees and willows.

F. Climate

In the Dillon area there are about 113 frost free days of growing season. The average July temperature of the Dillon area is 61° and in January, $+24^{\circ}$. Sub-zero temperatures for short durations are frequent during the winter months. The average precipitation is 11.6 inches in the Dillon area. Monthly distribution of rainfall varies, but the largest portion falls during May, June and July. Snowfall is relatively light in the valley.

G. Transportation

Public railroad transportation in the Beaverhead Valley is provided by the Union Pacific Railroad, running one freight train daily each way between Salt Lake City, Utah, and Butte, Montana; however, the Union Pacific Railroad does not offer passenger service. Intermountain Transportation Bus Lines offers passenger service through Dillon between Salt Lake City, Utah, and Butte, Montana. There are three scheduled trips daily each direction. There are no commercial airlines serving the area, although a county owned airport three miles east of Dillon serves light aircraft.

H. Utilities

The Montana Power Company and the Vigilante Electrical Co-operative serve all power and natural gas needs in this area.

I. Medical Facilities

This area is served by a new hospital, Barrett Memorial Hospital. The hospital is located about 200 feet east of the Dillon interstate connection near the south edge of town. It is staffed by four resident physician-surgeons, and four registered nurses. Ambulance service is offered by a private firm in Dillon. There is also one veterinary hospital located in Dillon.

J. Education Facilities

Beaverhead County High School is located in Dillon and has an average enrollment of 835 students. Western Montana College is also located in Dillon and has an enrollment of from 800 to 900 students.

K. Scenic Areas and Points of Interest

The Lewis and Clark Expedition traveled through the Beaverhead River Valley in 1805.

The first ranching in this area was established in 1865.

IV. EVALUATION OF ENVIRONMENTAL IMPACTS

A. Environmental Impacts of the Proposed Action

The proposed South Dillon Interchange came about as a result of considerable involvement by the citizens of Dillon, particularly businessmen, requesting a second interchange. Since Atlantic Street in Dillon is already the main thoroughfare through Dillon (U.S. 91), most people in Dillon favor the linking of the interchange with this street. For this reason, the location of the interchange and connecting highway is proposed at its present location.

The significant impact of this interchange and connection would be upon the ranch which they would cross. This ranch, the Cornell Ranch, is a relatively large cattle and sheep producing ranch. The interstate highway, the interchange and the connecting roadway would disrupt the

ranching operations, as they would cross and divide the ranch property. Proposed measures to mitigate the impact of the highway facility upon the ranch include the construction of approaches and a private access road from the interchange to property west of the interstate, and the perpetuation of the ranch's irrigation system.

A design Public Hearing was held on October 2, 1973, concerning these projects. Most of the testimony at this hearing regarded the South Dillon Interchange and connecting road. Considerable testimony, both for and against the proposed interchange, was offered by Dillon area residents. In general, Dillon businessmen favor the interchange while area ranchers and farmers oppose it.

The "old hospital laboratory building" would have to be relocated due to the proposed alignment of the interstate connection. This building is no longer being used for a laboratory, but is being used as a pre-school and as a day nursery. The alignment connecting to Atlantic Street was chosen because Atlantic Street is the route of U.S. 91 and is favored by most businesses and others in Dillon. This fact was brought out by testimony in and attachments to the official transcripts of public hearings held in Dillon on July 7, 1965 and on August 6, 1969. There would be no enhancement of work, school, recreational or religious activities as a result of these projects, other than the facility would provide safer and more efficient transportation for those using it to commute to Dillon for such activities.

Any utilities interfered with by construction would be relocated or otherwise cared for.

There was a meeting in Dillon on March 8, 1972 with the City Council concerning the connecting primary highway. There was discussion concerning the elimination of the "Y" intersections and realignment of U.S. 91 on Chapman Street to Atlantic Street. The Council indicated that the 25 foot curb radius proposed at the intersection of Chapman and

Atlantic Streets would probably be inadequate. As a result of this meeting, the curb radius was increased to 40 feet, which will allow the turning movement of a semi-trailer truck at the intersection of Chapman and Atlantic Streets. This revision was sent to the City of Dillon for their comments. At a later meeting some minor design revisions were suggested which may necessitate removal and replacement of several large trees in the immediate vicinity of the old hospital building.

Barrett Memorial Hospital is located about 200 feet east of the Dillon interstate connection on the south edge of town. The hospital would not be significanlty affected by these projects. The hospital is presently located about 175 feet west of U.S. 91 and at present U.S. 91 carries all traffic entering Dillon from the south. This includes thru traffic which has no need or desire to stop in Dillon. The Dillon-I Connection would carry only traffic of those going to and coming from Dillon on the south, while the interstate highway would carry all through traffic not desiring to stop in Dillon. Therefore, a decrease of traffic in the area of the hospital can be expected. This plus the increased distance between highway and hospital would decrease the noise which would be received in the hospital area.

The Board of Trustees of the Barrett Hospital Association has endorsed the location of the proposed Dillon-I Connection and Interchange. They feel that the roadway is vital to the proper function of the hospital. This view was expressed in a letter to the Montana Department of Highways from the Board of Trustees, following a meeting of the board during which the project was discussed.

A noise study was conducted for the Dillon-I Connection on January 16, 1974. The study was done for the area near the end of the project

at the south edge of Dillon. Noise measurements were done for five locations, including Barrett Memorial Hospital. All locations indicated readings below the allowable limit of L_{10}= 70 dBA. The ten-percentile level (L_{10}) is the sound level which is exceeded only 10% of the time; the level indicating the most noisy events at a point, representing generally the noisiest vehicles in a traffic flow mix. Noise level predictions were then made for the same locations using the traffic data for the design year of 1993. All locations with the exception of one were below the allowable limit. The exception was the house located on the east side of Atlantic Street next to the M & L Motel. The prediction was L_{10}= 76 dBA. The Montana Department of Highways investigated the possibility of noise abatement for this location and determined that it would not be feasible. As a result, the department requested from the FHWA an exception to the FHWA noise level standards for this location. The exception was approved by the FHWA, and their approval letter is included with this statement.

The valley consists predominately of sub-irrigated hay and pasture land. The existing water table is not expected to be altered due to special consideration being given as mentioned under "Physiography and Geology". Some of this land will be taken out of use by these projects, as new right-of-way will be required.

The character of the area would be altered by the intrusion of the highway on this area. Slopes would be topsoiled and seeded to blend with the adjacent terrain. Existing irrigation and drainage patterns would be continued. Land use would not change appreciably because of these projects. An exception might be the land adjacent to the two interchanges and along the Dillon-I Connection. As is often the case, non-commercial land next to interchanges tends to become valuable as commercial property and is often developed as such. This possibility exists for both

the interchanges and along the Dillon-I Connection. Limited access is proposed along this Connection. Assuming the access remains limited, this land probably would not be subject to land use change as a result of the new highway and interchange although subdivision is a possibility. The total amount of land taken (264 acres) would be small compared to all of the land with the same use adjacent to these projects. Separation structures are proposed approximately 400' beyond Poindexter Slough. These structures would help mitigate severence damage caused by the interstate. A cattle and hay ranch in the vicinity of the South Dillon Interchange would be severed by the interstate highway and the Dillon-I Connection. Access to land west of the interstate would be provided by an access road from the South Dillon Interchange. Access to land on each side of the I-Connection would be provided by at-grade approaches to the I-Connection. The possibility of additional access is presently being studied.

The interstate highway would cross the Beaverhead River and Poindexter Slough. The alignment of the highway at the Beaverhead crossing has been carefully selected to avoid any channel change in the Beaverhead River. A channel change would not be necessary at the Poindexter Slough Crossing. Bridge piers would not be located in the river or the slough. Riprap would be provided to prevent erosion of the highway embankment, but the riprap would be placed back of the river bank so as not to disturb the existing riverbank vegetation. The Dillon-I Connection would cross Blacktail Creek. A previously proposed channel change on this stream has been eliminated by providing a bridge crossing and warping embankment slopes to prevent their encroaching on the stream channel. The special consideration given to this stream crossing and the Beaverhead and Poindexter crossings was a result of close coordination between the Department of Fish and Game and the Department of Highways. Compliance by the Contractor with the Montana Department of Highways

Standard Specifications regarding water pollution will help to avoid pollution problems during construction.

B. Adverse Environmental Effects Which Cannot Be Avoided

The taking of hay and pasture land for highway right-of-way is unavoidable. Since at present, there is not a highway at the proposed highway location, then the altering of the character of the area is also unavoidable.

C. Alternatives

One alternative would be not to build these projects. This would not comply with the National Highway Defense Act and would leave a gap in the Interstate Highway System. If the Interstate were not built, there would be no need for the I-Connection.

If these projects were not built, the through as well as local traffic would have to use the existing highway. This would create congestion and many safety problems. It would force all of the through traffic onto the main streets of Dillon, adding it to the local vehicular and pedestrian traffic bound for work, shopping, schools, churches, the hospital and other social facilities.

The same volume of traffic would be expected to pass through the area either with or without this particular segment of I-15. Without I-15, because of more stop-and-go requirements and numerous slowdowns of traffic, the amount of pollutants in the atmosphere would be greater than with I-15.

If this short segment of I-15 and the I-Connection were not built, it is unlikely that it would have the effect of hindering industrial development in Dillon and the surrounding area. As previously stated, it is not expected that any large degree of industrialization will develop in the Dillon area because of its agricultural economic base.

The alternate of a bypass to the west of Dillon above the flood

plain was studied and found to be impractical. It is further discussed in response to the U.S. Department of the Interior's comments on the draft statement.

Another alignment of the interstate highway paralleled the Union Pacific Railroad for about 2.5 miles more than the proposed alignment, but this section of highway would have crossed the Beaverhead River once, and the Poindexter Slough at three locations and would have involved some channel changes in each stream. The I-Connection alignment would not have been affected. After due consideration of the detrimental environmental effects involved, in coordination with the Montana Department of Fish and Game the alignment was shifted to the present alignment which does not involve any channel changes. Another significant reason is that less desirable soils were encountered in the area of the former alignment.

D. Relationship Between Short-Term Uses of Man's Environment and the Maintenance and Enhancement of Long-Term Productivity

In the vicinity of this project, it can only be estimated that short term use, as well as the long term use, of the environment of the Beaverhead Valley would be of an agricultural nature. Recreation is also an important use. The construction of this project should not change the agricultural business being conducted in the area at the present. As time progresses, more use will be made of the highways and the demand will be greater for roads that provide safe and efficient transportation. Demand on the area for recreation will naturally increase as population increases. The new highway facility, however, should not result in increased demand on the recreational facilities of the area. As mentioned elsewhere in the statement, traffic through the area should increase at the same rate with or without this particular section of new highway.

E. Irreversible and Irretrievable Committments of Resources

Hay and pasture land would be taken for highway right-of-way. Although this land would not be rendered useless, it would no doubt be taken

out of agricultural production for a long time. However, its economic productivity as a transportation facility will increase substantially. Should this land ever be abandoned for highway use, it could be restored to its present state.

No significant social or cultural resources are anticipated to be irreversibly or irretrievably commited.

There would be no resources other than normal construction materials irreversibly or irretrievably committed to the project.

V. BENEFITS

All people traveling would benefit by having an improved highway that provides safer and more efficient transportation. An improved highway would benefit this area, which is devoted mostly to agriculture, by providing better farm-to-market movements. Congestion would be alleviated by removing traffic not needing or desiring to enter Dillon from the interstate.

VI. MINIMIZING ADVERSE ENVIRONMENTAL EFFECTS

Slope rounding, topsoiling and seeding of disturbed areas are measures that would be taken to blend the highway with adjacent terrain to minimize environmental damage. All cut and fill slopes, borrow areas, and any other disturbed areas would receive this treatment. Embankment protectors and riprap would be used where necessary for protection against erosion. Natural vegetation would be preserved wherever possible. Contour grading and topsoiling and seeding would be used on the interchanges to improve their aesthetics and to prevent erosion.

Enforced compliance with existing laws and specifications concerning water and air pollution would help to minimize environmental damage. The provisions for air quality controls are not in conflict with the state implementation plan as prepared by the Department of Health and Environmental Sciences.

The contractor would be required to prevent construction operations or the results of construction operations from silting rivers, streams and impoundments (lakes, reservoirs, and the like). The construction of planned drainage facilities and the performance of other contract work that would help control siltation would be done as soon as it is practicable. The siltation control measures would be continued until the permanent drainage facilities have been constructed.

The contractor would shape the subgrade on road beds in the immediate vicinity of rivers, streams or impoundments prior to any lengthy suspension of construction operations. Shaping would be done in a manner that would permit runoff waters to be intercepted along the outer edges of the subgrade and drainage from the subgrade by temporary slope-drains. The temporary slope-drains would be located along fill slopes at 500 foot intervals, approximately, and would be paved or covered with water-proof materials.

Construction operations in rivers, streams and impoundments would be restricted to those areas which must be entered for the construction of temporary or permanent structures. Temporary bridges, culverts or similar structures would be used wherever crossings of a stream or river cause excessive siltation. Mechanized equipment would not be operated in rivers, streams or impoundments except as may be required to construct temporary or permanent structures. Rivers, streams and impoundments would be promptly cleared of such obstructions as falsework, piling or other obstructions caused by the construction operations, after the purpose of such obstructions have been served. Debris in rivers, streams or impoundments caused by construction operations would be promptly removed.

In areas where erosion or siltation is anticipated, grubbing would be confined to the area over which excavation is to be actively prosecuted

within approximately 30 days following grubbing operations. Depressions resulting from grubbing operations outside the roadbed, if not free draining, would be made so by backfilling with suitable material or grading to drain. Where scour is likely to occur, temporary erosion control settling basins would be constructed.

The contractor would be required to exercise every reasonable precaution throughout the life of the project to prevent pollution of rivers, streams or impoundments. Pollutants such as chemicals, fuels, lubricants, bitumens, raw sewage and other harmful wastes would not be discharged into or alongside of rivers, streams, impoundments or into natural or manmade channels leading thereto. The contractor would meet the requirements of the applicable regulations of the State or Department of Fish and Game, Department of Health and Environmental Sciences and other State or Federal regulations relating to the prevention or abatement of water pollution.

The contractor would inform himself of all applicable Department of Health and Environmental Sciences requirements and similar State or Federal requirements pertaining to control of or abatement of air pollution. He would provide such air pollution control measures as are required to comply with the minimum standards established by such agencies. All plant-mix plants would be equipped with a dust collector constructed to waste or return uniformly to the hot elevator all or any part of material collected as directed. Scrubbers or similar devices would be used when required by the Department of Health and Environmental Sciences.

The contract would specify the methods of disposal of all brush, stumps, windfalls, slash, timber having no commercial value and any other debris resulting from clearing, grubbing or clearing and grubbing operations. When burning is permitted by the contract, the contractor must have a permit from the Chief of the Air Quality Bureau, Department of Health and Environmental Sciences. The permit will stipulate the

conditions and method of burning. Burning must be accomplished under the constant care of competent watchmen.

The revised alignment beginning about 0.8 mile from the south end of the project and extending about 2.8 miles northerly would help to preserve the ecosystem of the Beaverhead River and Poindexter Slough.

VII. PUBLIC HEARING COMMENTS

The design public hearing for these projects was held on October 2, 1973, in Dillon, Montana. At this hearing the major design features of the projects as now proposed were presented.

Nearly all of the testimony by Dillon area residents concerned the location of the proposed South Dillon Interchange. In general, the townspeople, particularly local businessmen, favor the location and design of the interchange as presented at the hearing. They feel that the interchange is vital to the economy and the needs of Dillon. The area farmers and ranchers generally oppose the location and the necessity of the interchange. Most feel that the existing interchange on the north edge of Dillon, plus the addition of the proposed interchange at the Jackson Road would be sufficient for the city of Dillon. They also oppose the interchange, as it would necessitate the taking of valuable farm and ranch land out of production. In their opinion, irreparable damage would be done to the Cornell ranch, on which the interchange and connecting road to Dillon would be built.

The other major point of discussion concerned the interstate alignment shift from the former position parallel to the Union Pacific Railroad to the presently proposed location some distance from the railroad as shown on the attached aerial map. The ranchers whose lands are affected by the alignment shift are opposed to the new alignment. With the

alignment next to the railroad, their land would be severed only once, as it is at present. With the alignment shifted to the west, their land would be severed in two places.

The reasons for the line shift were explained, the primary one being the problems involved with Poindexter Slough fishery.

After consideration of the public hearing testimony and the alternatives involved, the Montana Highway Commission approved these projects as presented at the design public hearing.

VIII.

Following are responses to comments from government agencies and interest groups and the related letters.

COMMENTS FROM GOVERNMENT AGENCIES AND INTEREST GROUPS

I. U.S. Department of Commerce

Comment: Several key topics were not analyzed in the Statement; they include: (1) air pollution aspects; (2) demographic changes and/or industrialization possibilities induced by the project and the ability of the local area to accomodate changes; (3) soil removal and disposal provisions; (4) wildlife problems during construction and following completion; (5) roadway maintenance; (6) flood or overflow of streams and rivers; (7) survey of historical or archaeological sites and the effect of the project on such sites; (8) land-use problems arising from the project and status of regulations, ordinances, etc. to control them.

Response: (1) Due to the projected increased traffic that will be using the proposed new highway, a proportionate amount of pollutants will be added to the air in the vicinity of this project. At present, air pollution is not a problem in the area mainly because of a small population, relatively low traffic volume and minimal industrial facilities. It is not expected that the increase in traffic volume will have a serious affect on the quality of air in the vicinity, particularly with the more stringent pollution requirements being imposed on today's new automobiles and on the automobiles of the future. These proposed highway facilities will provide an improved traffic system for the Dillon area which could actually help to reduce air pollution as a result of smoother traffic flow. Some air pollution will likely be produced during construction of this project, largely dust caused by construction equipment. Measures for dust control will be included in the project proposal. In addition, the provisions to be included in the proposal for maintenance of air and water quality have been added to the final statement.

(2) It is not anticipated that the proposed new highway facility will induce any significant increase in human population in the area, except for a temporary increase during construction. While the highway will improve transportation to and from the area, it is doubtful that it will have the direct effect of increasing industrialization. Dillon and the surrounding area has agriculture as the basis of its economy, and it will likely remain that way.

(3) A large portion of the proposed highway will traverse over ground which has a high water table and an unstable foundation. Because of this fact it has been recommended that no topsoil be removed wherever this condition occurs. Any topsoil that is removed, however, will be used in completing the topsoiling of the highway embankment slopes. No other operation during construction should generate any significant amount of soil requiring disposal.

(4) It is not anticipated that this project will have a significant effect on wildlife either during construction or following completion.

(5) It is not anticipated that the proposed highway will require any special maintenance other than normal, routine maintenance. The roadway consists of low embankments (5.0' average), flat slopes (6:1 average) and no significant cuts. All grades are relatively flat grades. Because of the flat, open nature of much of the area through which the highway will traverse, blowing, drifting snow could produce hazardous driving conditions at times. High winds and heavy snowfall do occur in the area, but are not a common occurrence.

(6) See Response to Department of Interior's letter re: flood hazard evaluation.

(7) The Department of Highways has a working agreement with the Director of the Statewide Archaeological Survey, Department of Anthropology, University of Montana to review all highway projects and determine the presence or absence of archaeological resources. The present policy is for this review to take place approximately one year before commencement of scheduled project construction. Since construction of this project will not be built for several years, the archaeological review has not been accomplished. We have no knowledge of any archaeological resources in the area of this project. Montana State Standard Specifications for Road and Bridge Construction Article 11.03 (K) Artifacts specifies the procedures to be followed should previously unkonwn archaeological resources be encountered during project development.

(8) As mentioned in the body of the report under IV. Evaluation of Environmental Impacts, land use will be affected little by the construction of the proposed highways. The exceptions to this are noted. Limited access is now proposed on the Dillon-I Connection. Should the land adjacent to the Dillon-I Connection ever be converted from agricultural use and developed as commercial or residential land, it could be accessible from the Dillon-I Connection.

Comment: The alternative of not building the road is rejected on the basis of fulfilling the requirements of the National Highway Defense Act. This alternative plus others, if applicable, could be better analyzed provided the statement included a discussion of the ramifications of the socio-economic values and other critical environmental factors.

Response: The section on Alternatives has been expanded in the final statement.

Comment: Bench Marks, Triangulation Stations, and Traverse Stations have been established by the National Geodetic Survey in the vicinity of the proposed project. Construction required for the project could result in destruction or damage to some of these monuments.

The National Geodetic Survey requires sufficient advance notification of impending disturbance or destruction of monuments so that plans can be made for their relocation. The National Geodetic Survey recommends that provision be made in the

project funding to cover costs of monument relocation.

Response: Our survey information does not indicate any Bench Marks, Triangulation Stations, or Traverse Stations in the immediate construction area of these projects. However, should any be found, the National Geodetic Survey will be notified so that proper relocation will be made.

II. U.S. DEPARTMENT OF THE INTERIOR

1. Description of the Project and of the Existing Environment

Comment: Data on the geology of the project area are limited. Environmental problems that may result from local geologic conditions should be recognizable from preconstruction investigations and be within the range of standard engineering practice.

Response: Much of the proposed highway passes through ground consisting of poorly drained, soft, highly organic material. Because of this fact, special attention has been given to foundation and embankment design in order to assure a stable roadway. Subexcavation in a few areas has been recommended. All fill material will be a high quality, free draining material. All embankments will have a minimum fill height of approximately five feet. Much of the embankment will be allowed to set for a period of time after grading to insure consolidation and allow any settlement which might occur. The embankment will then be regraded to final grade. These measures should alleviate anticipated problems in these areas.

No other known geologic or soil conditions exist on these projects which might cause problems.

Comment: There are several references scattered throughout the text that indicate water resources have been considered in relation to various construction techniques. However, there are no descriptive data of water resources in the project area. This segment of the draft should contain a brief description of the local water resources, especially the location of springs and sloughs with respect to the proposed alignment. Should the project affect the flow of these resources or should they require consideration in the design, such information should be included in the statement.

Response: There are streams, a river, and numerous springs in the area of these projects. The Beaverhead River is the only river in the immediate area. It lies approximately 1000 feet to 2000 feet east of the I-15 alignment from the beginning of the project to Station 126±, where it intersects the alignment. From this point the river runs in a northwesterly direction, leaving the general area of the interstate alignment. The Poindexter Slough, which is a stream fed by ground water, crosses the I-15 alignment at Station 152±. It then empties into the Beaverhead River approximately ½ mile west of the

interstate. Blacktail Creek meanders a few thousand feet east of the interstate alignment at the southern outskirts of Dillon and crosses the Dillon-I Connection. Several springs lie in the area of the proposed alignment of I-15 and of the Dillon-I Connection. Where the alignment intersects the source or flow of these springs, they will be perpetuated with perforated underdrains and pipe.

Comment: Additional data are needed in this section of the draft to complete discussions pertaining to channel changes required during construction. In light of this, we urge that every reasonable effort be made to avoid or minimize channel changes in Blacktail Creek as have been done with Beaverhead River and Poindexter Slough through the coordinated efforts of the Montana Department of Fish and Game and the Montana Highway Department. Should total avoidance of this channel change be impossible, the impacts of such action should be more fully developed in the final statement.

Response: It is now proposed to eliminate the channel change on Blacktail Creek by providing a bridge crossing and warping the roadway slopes. This will eliminate the possible harmful effects to the fish habitat caused by a channel change.

Comment: This section should also include flood hazard evaluation in compliance with Executive Order 11296. FHWA has issued Memorandum 20-1-67 to implement the Executive Order. Subsequently, in April 1972, the Water Resources Council issued "Flood Hazard Evaluation Guidelines" which are to be utilized by Federal Executive Agencies in complying with Executive Order 11296. Only with this flood hazard information can reviewers comprehend the environmental impact of the highway on the flood plain.

Response: The magnitude of the flows in the Beaverhead River in this area is nearly completely controlled by the Clark Canyon Dam located about ten miles upstream. The only major tributary to the Beaverhead River between the dam and the beginning of the project is Grasshopper Creek which enters the Beaverhead River about four miles upstream from the beginning of this project. About one mile upstream from the beginning of the project the Beaverhead River flows through the Beaverhead Canyon Gateway. At this point is the Barretts Dam used for diversion of irrigation water. Downstream, the flood plain expands over a broad valley where several overflow channels and several irrigation canals will carry some flood waters. The major overflow channel is Poindexter Slough and the major canal is the Dillon Canal which can carry flood waters from Poindexter Slough to Blacktail Deer Creek. The amount of water carried by any canal or channel is dependent on capacities of existing bridges and checkworks as well as natural controls.

The basic flood (100 year flood) for the Beaverhead River at Barretts is about 3500 c.f.s. based on 56 years of stream gaging data compiled prior to operation of Clark Canyon Dam.

The objective of normal operation at Clark Canyon Dam is to maintain nondamaging flows at Barretts to the maximum extent possible. The magnitude of these flows is well below the basic flood. Only under certain combinations of conditions such as useable storage remaining in the reservoir and storm conditions on the drainages above and below the dam can flows approaching the basic flood be expected.

The low water channels of the Beaverhead River and Poindexter Slough do not have sufficient capacity to carry the flood waters of the basic flood. During the basic flood the overbank flows will cause inundation of the flood plain to depths of two to three feet.

About one third of the basic flood will be conveyed as overbank flow in the Beaverhead River and Poindexter Slough. Because of the broad flood plains, these flows cannot be conveyed through the roadway without creating backwater and increases in velocity. The increase in velocity at these two crossings is about 0.5 ft./sec. and is not sufficient to present a hazard or to cause any damage either upstream or downstream. There will not be a significant increase in the extent of possible damage to property as a result of the increase in flood stage due to the highway encroachments on the flood plain. The depth of flood water on the flood plain will be increased by about 0.7 ft. at the Poindexter Slough crossing and about 1.0 ft. at the Beaverhead River crossing.

The crossing of Blacktail Deer Creek does not create any possible damage to property either upstream or downstream. The natural channel will convey the basic flood with little overbank flow. The structure has been designed to carry the basic flood (600 c.f.s.) plus 200 c.f.s. of flood flow from Poindexter Slough via the Dillon Canal.

Comment: This section of the statement should also reflect consultation with the National Register of Historic Places, and discuss whether any National Register properties will be affected. If the project has an effect on a National Register listing, the statement should reflect further compliance with Section 106 of the National Historic Preservation Act of 1966 (P.L. 89-665).

The Statement does not clearly confirm consultation with the State Historic Preservation Officer of Montana. The final environmental statement should reflect that he was consulted to determine whether the proposal will affect any cultural site which may be in the process of nomination to the National Register of Historic Places and contain a copy of his response.

Response: A copy of a letter from the State Historic Preservation officer is included in the final statement. This letter indicates that there are no historic sites within the project area listed on the National Register of Historic Places, and that impacts on other historic resources of the area will be negligible.

Comment: The statement should discuss the action taken or proposed to

professionally determine the presence or absence of archaeological resources in the project area and the effect of the proposal upon any such resources present. The statement should further reflect procedures to be followed should previously unknown archaeological resources be encountered during project development.

Response: See response (7) under comments from U.S. Department of Commerce.

2. Evaluation of Environmental Impacts

Comment: The description of alternates is somewhat limited and should be expanded. The alternative of no action is summarily rejected due to noncompliance with the National Highway Defense Act. However, the National Environmental Policy Act (NEPA) supersedes the National Highway Defense Act. CEQ guidelines direct each agency to "interpret the provisions of NEPA as a supplement to its existing authority and as a mandate to view traditional policies and missions in light of NEPA's national environmental policies". Moreover, the guidelines specifically require that the alternatives section of an EIS contain "a rigorous exploration and objective evaluation of alternative actions that might avoid some or all of the adverse environmental effects". Therefore, the no action alternate should be fully discussed in the final statement to establish baseline environmental data,particularly concerning natural ecosystems, against which to measure adverse effects of the proposal and alternates.

Response: This section of the final statement has been expanded.

Comment: Also, there are other alternatives not discussed in the draft--a bypass to the west of Dillon above the flood plain and the possibility of constructing a modern two-lane route--which should be fully explored. Each alternate should be discussed in detail to allow an impartial evaluation of its impact on both natural and human aspects of the environment.

Response: This interstate project involves the connecting of two portions of previously completed interstate highway which are only 5.6 miles apart. Because of this fact, the selection of alternate routes for this project is extremely narrow. The alternate of a bypass to the west of Dillon above the flood plain was studied and is impractical because of the following. An out of direction route would be required. This route would add considerable length to the project and would result in a much higher cost. In order to locate the highway above the flood plain, the route would have to enter, traverse across, and leave the steep bluffs which rise to the west of the Beaverhead River. This would result in much more difficult engineering problems, an extremely large amount of earthwork and a resultant higher cost. It would also necessitate a longer connecting road from the South Dillon interchange to Dillon. The alternative of a modern two-lane route does not meet the present standards for interstate highways.

Comment: The section, "Relationship Between Short-Term Uses of Man's Environment and the Maintenance and Enhancement of Long-Term Productivity," should be explained. This section should recognize the long term benefits--tree and shrub growth, wildlife, and grazing--that will give way to the project. These benefits should then be compared to those gained by the highway facility. This information should bring into focus for the decision-maker those tradeoffs (economic, short-term versus natural environment, long-term) involved in this project.

Response: The construction of the project will necessitate the taking of some agricultural land out of production, but will not change the agricultural business being conducted in the area at present. The loss of this land to the highway should not appreciably affect the ability of the area to produce livestock in increasing numbers, even though the total area available for grazing and for hay growth will be diminished. Because of this fact, the benefits gained by the new highway facility outweigh the loss of these long-term benefits.

Comment: The "Irreversible and Irretrievable Commitments of Resources" segment of the draft should be expanded to discuss the irretrievable commitments of fish and wildlife resources. Access and frontage roads will likely radiate from the new highway and increase access to and from Beaverhead River and Blacktail Creek. Such increased access and related human involvement would result in considerable increased pressures on these resources. This action would result in irretrievable commitments of fish and wildlife values in the project area.

In addition, this section should discuss the amount of gravel and borrow needed for the right-of-way during construction. Specific locations, type of operations and related reclamation measures should be identified and described.

Response: It is unlikely that the new highway will increase pressures on the fish and wildlife resources of the Beaverhead River, Poindexter Slough, and Blacktail Creek. If the new highway were not built, we must assume that future traffic will still increase at the same rate. Without a controlled access facility, and this is what we would have without the interstate, the increased traffic would have access to the rivers and streams at virtually any point along the existing highway. With the interstate direct access to these areas is limited to two points of access, the Jackson Interchange and the South Dillon Interchange. Although existing U.S. 91 will remain intact if the interstate is constructed, the major volume of traffic will be removed from it by the interstate. No other public frontage roads or trails are planned for this project that will increase access to the area's rivers and streams. It is possible, therefore, that pressure on the fish and wildlife resources could actually diminish, or at least increase at a slower rate with the construction of the new highway facility.

Estimates of the amount of borrow material required to construct

these highway facilities were made during the preliminary design stages and will not be updated until later stages of final design. The preliminary estimates for borrow material are:

I-15	2,220,000 Cu. Yds.
Dillon-I Connection	112,000 Cu. Yds.

A borrow pit has been secured and is located approximately 2.5 miles northwest of the Jackson Road Interchange. The contractor who constructs the project has the option of locating his own borrow sources. Consequently, recommended locations for borrow sources, even though optioned by the Department of Highways, need not be used by the contractor. Provisions regarding pit locations and reclamation are required for this project and are as follows:

The contractor will familiarize himself with the requirements of the Montana Open Cut of Strip Mined Reclamation Act (Chapter 224, Session Laws of 1971) and shall be in conformance with the requirements thereof.

Prior to commencing operations for the removal of any earth, quarried rock, sand, gravel aggregate or other substance from material sources outside of the highway rights-of-way, the contractor will have submitted a reclamation plan to, and received approval of the plan from the Montana Department of Highways.

Approval of the reclamation plan will be based on the overall effect of the finished slopes on the adjacent landscape, the location of the pit relative to the view from the traveled roadway, possible adverse effect on streams, lakes and adjacent plant forms, and surrounding environment. In addition, the contractor shall shape, slope (recommended maximum 3:1 but in any event, pit walls remaining will blend with natural slope of the adjacent area), revegetate, place top soil on, or in other ways provide a finished materials pit site that blends satisfactorily with the adjacent landscape and is acceptable in appearance to the engineer.

Overburden, including topsoil, will be stripped from all material sources and conserved. After the pit or excavated area has been completed and all materials needed therefrom removed, the sides will be shaped, trimmed and sloped as required. Topsoil material and overburden will be placed back in the pit area. The entire excavated area including haul roads will be seeded and fertilized as shown in the Special Provisions.

Comment: The discussion of mitigating measures in this section of the draft lacks detail. The final statement should relate measures specifically to the project and identify specific locations where particular measures will be carried out.

Response: The measures discussed in the section on Minimizing Adverse Environmental Effects apply specifically to these projects and will be used at all locations where they are applicable.

III. Department of Fish and Game

Comment: In the discussion of channel changes, it is stated that a channel change of Blacktail Creek is required and necessary. We believe the wording should be changed to indicate something other than necessity because Blacktail Creek can be bridged without requiring channel change.

Response: The proposed channel change has been eliminated.

Comment: The last statement in Section IV is contradictory with other statements on page 3. We believe that "on these two rivers" should be added to the statement.

Response: "On these two rivers" has been added.

Comment: On page 7, it should be added that the purpose of the Primary connection is an additional link from the Interstate to the city of Dillon. There are two other interchanges planned which serve the same purpose, although perhaps not as direct to the downtown area of Dillon.

Response: The word "additional" has been added to the statement.

Comment: On page 9, or elsewhere in the report, it may be helpful to point out the considerations given to avoid stream encroachment on the Poindexter Slough and Beaverhead River bridge crossings, and that these considerations were at least partially the result of close coordination between our departments.

Response: See discussion under "Alternatives" and under "Evaluation of Environmental Impacts".

Comment: On page 10, should there be a discussion of the entire controversy surrounding the Blacktail Creek crossing since cause for issuing an environmental impact statement concerns the controversial nature of projects? We believe more discussion of the pros and cons of this crossing would be appropriate.

Response: The proposed channel change on Blacktail Creek has been deleted, thus eliminating the major controversy regarding the crossing.

Comment: On page 11 concerning discussion of springs and sloughs in the area and that "special consideration" will be given to drainage, an evaluation of the loss of waterfowl and related wildlife habitat should be included. It is more advisable environmentallly to give special consideration to the retention of the natural areas than it is to give special consideration to draining them.

Response: The "special consideration" given to drainage included the

perpetuation of all natural waterways or channels and the preservation of springs when crossed by the highway at their source. No sloughs, springs, or other natural waterways will be drained in the sense that they will dry up.

Comment: On page 12, the statement "Blacktail Creek supports a good Trout population and is relatively accessible to youngsters and adults who desire fishing close to town" should be added to Section D.

Response: This statement has been added.

Comment: After discussion with game division personnel, we believe the last sentence on page 12 concerning effects on migratory waterfowl should be deleted.

Response: This sentence has been deleted.

Comment: On page 16, we understand that large trees have excellent capability for dampening sounds of traffic. We believe removal of large trees in the immediate vicinity of the hospital would probably have the undesirable effect of increasing noise levels in the immediate hospital area. This is an off-the-cuff suggestion since we are admittedly not versed in the intricacies of noise pollution.

Response: The tree removal referred to is in the vicinity of the old hospital which has been abandoned as a hospital.

Comment: The discussion of channel change on page 17 may be unnecessary due to project plan revision.

Response: The channel change is no longer proposed.

Comment: On page 19, Section D, we believe the immediate area of the project also receives a significantly high amount of recreational use, in addition to agricultural use.

Response: This subject has been expanded on in the final statement.

2

Form FHWA 121 (Rev. 7-72)

UNITED STATES GOVERNMENT

DEPARTMENT OF TRANSPORTATION

FEDERAL HIGHWAY ADMINISTRATION

Memorandum

MONTANA HIGHWAY COMMISSION
RECEIVED
APR 1 7 1974
HELENA, MONTANA

DATE: April 16, 1974

In reply refer to: 08-30.42

SUBJECT: Montana F 241(20)
Dillon I-Connection

FROM : H. N. Stewart, Division Engineer
Helena, Montana

TO : Mr. H. J. Anderson, Director of Highways
Montana Department of Highways
Helena, Montana 36 SCK

The exception to highway noise standards requested in your February 7, 1974, letter is approved.

In approving this exception we considered that the cost of a very minor noise reduction would not be economically reasonable; that a barrier construction would result in a wall around a business which, in effect, would tend to hide the business from the patronizing traveler; the necessary right-of-way for barrier construction may require the elimination of the building; and the noise level at the time of use of the motel would be considerably less than the predicted peak as shown and thus not interfering appreciably with the business. The present law does not permit the use of Federal-funds to insulate the private building from noise pollution.

By: E. B. Erickson
District Engineer

Date Recd. Preconst. 4-17-74

Act	Info	MAIL ROUTE	Attach	Initial
		30		
	✓	30 Hwy. Specialties		
		31 Contract Plans		
		32 ... Road Design		
		33 Environmental		
		34 Hydraulic		
		35 Structural Design		
		35 Photogrammetry		
	✓	36 Traffic		
		37 Pub. Hearing		
		38 Sec. Urban		
	✓	39 Consultant Design		
	✓	File		

ACT INF
RETURN TO M & F
MAY BE RETAINED
[illegible] SERVICES
ACCOUNTING
DATA PROCESSING
PLANNING & RESEARCH
CONSTRUCTION
MATERIALS
RIGHT-OF-WAY

3Ea

OFFICE OF THE ASSISTANT SECRETARY OF COMMERCE
Washington, D.C. 20230

MONTANA HIGHWAY COMMISSION
RECEIVED
OCT - 5 1973
HELENA, MONTANA

September 28, 1973

Mr. H. J. Anderson
Director of Highways
State of Montana
Department of Highways
Helena, Montana 59601

Dear Mr. Anderson:

The draft environmental impact statement for "I 15-1(5)51 Dillon South, F 241(20) Primary Connection," which accompanied your letter of August 13, 1973, has been received by the Department of Commerce for review and comment.

The statement has been reviewed and the following comments are offered for your consideration.

Several key topics were not analyzed in the statement. They include: (1) air pollution aspects; (2) demographic changes and/or industrialization possibilities induced by the project and the ability of the local area to accommodate changes; (3) soil removal and disposal provisions; (4) wildlife problems during construction and following completion; (5) roadway maintenance; (6) flood or overflow of streams and rivers; (7) survey of historical or archaeological sites and the effect of the project on such sites; and (8) land-use problems arising from the project and status of regulations, ordinances, etc. to control them.

The alternative of not building the road is rejected on the basis of fulfilling the requirements of the National Highway for Defense Act. This alternative plus others, if applicable, could be better analyzed provided the statement included a discussion of the ramifications of the socio-economic values and other critical environmental factors.

Bench marks, triangulation stations, and traverse stations have been established by the National Geodetic Survey in the vicinity of the proposed project. Construction required for the project could result in destruction or damage to some of these monuments.

The National Geodetic Survey requires sufficient advance notification of impending disturbance or destruction of monuments so that plans can be made for their relocation. The National Geodetic Survey recommends that provision be made in the project funding to cover costs of monument relocation.

Thank you for giving us an opportunity to provide these comments, which we hope will be of assistance to you. We would appreciate receiving a copy of the final statement.

Sincerely,

Sidney R. Galler

Sidney R. Galler
Deputy Assistant Secretary
for Environmental Affairs

Date Recd. Preconst. 10-5-73

Act	Info	MAIL ROUTE	Attach	Initial
		30		
		30 Photogrammetry		
		30 Surfacing Design		
		30 Environmental		
		31 Contract Plans		
		32 Loc. - Road Design		
		33 Eng. Specialties		
		34 Hydraulic		
		36 Traffic		
	✓	37 Pub. Hearing		
		38 Sec. - Urban		
	✓	39 Consultant Design		
	✓	File		

March 3 1849

United States Department of the Interior
OFFICE OF THE SECRETARY
MISSOURI BASIN REGION
BUILDING 67, DENVER FEDERAL CENTER
DENVER, COLORADO 80225

MONTANA HIGHWAY COMMISSION
RECEIVED
OCT - 3 1973
HELENA, MONTANA

RETURN TO M & F
MAY BE RETAINED
DIRECTOR
CENTRALIZED SERVICES
ACCOUNTING
DATA PROCESSING
PLANNING & RESEARCH
OCT 1 1973
MAINTENANCE
MOTOR POOL
PERSONNEL
OTHER
INF
ACT

IN REPLY REFER TO:
ER-73/1168

Mr. H. J. Anderson
Director of Highways
Montana Department of Highways
Helena, Montana 59601

Dear Mr. Anderson:

This is in reply to your letter requesting the Department of the Interior's comments on a draft environmental statement for Interstate 15-1(5)51 Dillon South and F 241(20) Dillon I. Connection, Beaverhead County, Montana.

General Comments

The draft statement covers several environmental concerns of this Department and recognizes a few of the adverse and beneficial effects which could emerge from the project. However, there are areas where further explanation and clarification are needed to strengthen the draft.

We note that this is the second draft environmental statement for construction of connecting sections of I-15. The first, Project I 15-1(32)37 Armstead North and South--I 15-1(31)46 Pipe Organ North and South--I 15-1(36)51 Pipe Organ North, involves Section 4(f) lands of the Clark Canyon Dam Recreation Area. The present statement covers nearly 6 miles in what appears to be a long-range plan to upgrade or construct segments of I-15 in Montana. We do not believe that a piecemeal approach is the best way to assess the environmental aspects of highway projects. Effects of short segments may be small, but the cumulative effects of the overall project may be significant. A segmented approach often forecloses options available to minimize overall impacts. Such options could be developed under more comprehensive planning. The piecemeal approach could eventually lead to an environmentally destructive action being justified on the basis of the commitment of resources in the part of the project already underway or completed. This EIS should address itself to the long-range plan on completing portions of and upgrading I-15, and the overall, cumulative impacts resulting therefrom, as required by the CEQ guidelines.

Specific Comments

1. Descriptions of the Project and of the Existing Environment

Data on the geology of the project area are limited. Environmental problems that may result from local geologic conditions should be recognizable from preconstruction investigations and be within the range of standard engineering practice.

There are several references scattered throughout the text that indicate water resources have been considered in relation to various construction techniques. However, there are no descriptive data of water resources in the project area. This segment of the draft should contain a brief description of the local water resources, especially the location of springs and sloughs with respect to the proposed alignment. Should the project affect the flow of these resources or should they require consideration in the design, such information should be included in the statement.

Additional data are needed in this section of the draft to complete discussions pertaining to channel changes required during construction. In light of this, we urge that every reasonable effort be made to avoid or minimize channel changes in Blacktail Creek as have been done with Beaverhead River and Poindexter Slough through the coordinated efforts of the Montana Department of Fish and Game and the Montana Highway Department. Should total avoidance of this channel change be impossible, the impacts of such action should be more fully developed in the final statement.

This section should also include flood hazard evaluation in compliance with Executive Order 11296. FHWA has issued Memorandum 20-1-67 to implement the Executive Order. Subsequently, in April 1972, the Water Resources Council issued "Flood Hazard Evaluation Guidelines" which are to be utilized by Federal Executive Agencies in complying with Executive Order 11296. Only with this flood hazard information can reviewers comprehend the environmental impact of the highway on the flood plain.

The discussion on fish and wildlife (page 12) in the project area is too general. Although some types of fish and wildlife present are identified, their abundance in the area involved should also be quantified. The lack of this information makes it difficult to determine and evaluate the proposed project's impact on any species present.

This section of the statement should also reflect consultation with the National Register of Historic Places, and discuss whether any National Register properties will be affected. If the project has an effect on a National Register listing, the statement should reflect further compliance with Section 106 of the National Historic Preservation Act of 1966 (P.L. 89-665).

The statement does not clearly confirm consultation with the State Historic Preservation Officer for Montana. The final environmental statement should reflect that he was consulted to determine whether the proposal will affect any cultural site which may be in the process of nomination to the National Register of Historic Places and contain a copy of his response.

The statement should discuss the action taken or proposed to professionally determine the presence or absence of archeological resources in the project area and the effect of the proposal upon any such resources present. The statement should further reflect procedures to be followed should previously unknown archeological resources be encountered during project development.

2. Evaluation of Environmental Impacts

The description of alternates is somewhat limited and should be expanded. The alternative of no action is summarily rejected due to noncompliance with the National Highway Defense Act. However, the National Environmental Policy Act (NEPA) supersedes the National Highway Defense Act. CEQ guidelines direct each agency to "interpret the provisions of NEPA as a supplement to its existing authority and as a mandate to view traditional policies and missions in light of NEPA's national environmental policies." Moreover, the guidelines specifically require that the alternatives section of an EIS contain "a rigorous exploration and objective evaluation of alternative actions that might avoid some or all of the adverse environmental effects." Therefore, the no action alternate should be fully discussed in the final statement to establish baseline environmental data, particularly concerning natural ecosystems, against which to measure adverse effects of the proposal and alternates.

Also, there are other alternatives not discussed in the draft--a bypass to the west of Dillon above the flood plain and the possibility of constructing a modern two-lane route--which should be fully explored. Each alternate should be discussed in detail to allow an impartial evaluation of its impact on both natural and human aspects of the environment.

The section, "Relationship Between Short-Term Uses of Man's Environment and the Maintenance and Enhancement of Long-Term Productivity," should be expanded. This section should recognize the long-term benefits--tree and shrub growth, wildlife, and grazing--that will give way to the project. These benefits should then be compared to those gained by the highway facility. This information should bring into focus for the decision-maker those tradeoffs (economic, short-term versus natural environment, long-term) involved in this project.

The "Irreversible and Irretrievable Commitments of Resources" segment (page 19) of the draft should be expanded to discuss the irretrievable commitments of fish and wildlife resources. Access and frontage roads will likely radiate from the new highway and increase access to and from Beaverhead River and Blacktail Creek. Such increased access and related human involvement would result in considerable increased pressures on these resources. This action would result in irretrievable commitments of fish and wildlife values in the project area.

In addition, this section should discuss the amount of gravel and borrow needed for the right-of-way during construction. Specific locations, type of operations and related reclamation measures should be identified and described.

3. Minimizing Adverse Environmental Effects

The discussion of mitigating measures in this section of the draft lacks detail. The final statement should relate measures specifically to the project and identify specific locations where particular measures will be carried out.

Sincerely,

For John E. [illegible]

Special Assistant
to the Secretary

MONTANA HIGHWAY COMMISSION
RECEIVED
OCT - 3 1973
HELENA, MONTANA

ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
SUITE 900, 1860 LINCOLN STREET
DENVER, COLORADO 80203

October 1, 1973

Mr. Stephen C. Kologi, P.E.
Supervisor, Preconstruction Section
Montana Department of Highways
Helena, Montana 59601

Dear Mr. Kologi:

The Environmental Protection Agency has reviewed the draft environmental statement for Project I15-1(5)(51 Dillon South and F 241(20) Dillon I Connection. It appears that there would be no significant environmental impacts resulting from this project.

In accordance with current EPA guidelines, the proposed project will be categorized in the Federal Register as LO-1. A copy of the rating system is enclosed for your information.

Please send us a copy of the final statement.

Sincerely yours,

for.

John A. Green
Regional Administrator

Enclosure

Date Recd. Preconst. 10-4-73

Act	Info	MAIL ROUTE	Attach	Initial
		30		
		30 Photogrammetry		
		30 Surfacing Design		
		30 Environmental		
		31 Contract Plans		
		32 Loc. - Road Design		
		33 Eng. Specialties		
		34 Hydraulic		
		36 Traffic		
	✓	37 Pub. Hearing		
		38 Sec. - Urban		
✓		39 Consultant Design		
	✓	File		

Environmental Impact of the Action

LO--Lack of Objections

EPA has no objections to the proposed action as described in the draft impact statement; or suggests only minor changes in the proposed action.

ER--Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating Federal agency to reassess these aspects.

EU--Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

Adequacy of the Impact Statement

Category 1--Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

Category 2--Insufficient Information

EPA believes that the draft impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft statement.

Category 3--Inadequate

EPA believes that the draft impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requestei more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the impact statement.

If a draft impact statement is assigned a Category 3, no rating will be made of the project or action, since a basis does not generally exist on which to make such a determination.

Figure 3-1. Attachment
Page 2 of 2

ANA HIGHWAY COMMISS
RECEIVED
1973
HELENA, MONTANA

STATE OF MONTANA

DEPARTMENT OF

FISH AND GAME
Helena, Montana 59601
October 1, 1973

Mr. H. J. Anderson
Director of Highways
Department of Highways
Helena, Montana 59601

Attention: Steve Kologi

Dear Mr. Anderson:

We have reviewed the draft environmental impact statement for I 15-1(5)51, Dillon-South and F 241(20), Primary Connection and offer the following comments:

On page 3, in the discussion of channel changes, it is stated that a channel change of Blacktail Creek is required and necessary. We believe the wording should be changed to indicate something other than necessity because Blacktail Creek can be bridged without requiring channel change.

The last statement in Section IV is contradictory with other statements on page 3. We believe that "on these two rivers" should be added to the statement.

Also in Section IV under Alternatives, we believe that the Primary Connection portion of this project could be omitted as a viable alternative and the project would still comply with the National Highway Defense Act.

On page 7, it should be added that the purpose of the Primary connection is an additional link from the Interstate to the city of Dillon. There are two other interchanges planned which serve the same purpose, although perhaps not as direct to the downtown area of Dillon.

On page 9, or elsewhere in the report, it may be helpful to point out the considerations given to avoid stream encroachment on the Poindexter Slough and Beaverhead River bridge crossings, and that these considerations were at least partially the result of close coordination between our departments.

On page 10, should there be a discussion of the entire controversy surrounding the Blacktail Creek crossing since cause for issuing an environmental impact statement concerns the controversial nature of projects? We believe more discussion of the pros and cons of this crossing would be appropriate.

On page 11 concerning discussion of springs and slough in the area and that "special consideration" will be given to drainage, an evaluation of the loss of waterfowl and related wildlife habitat should be included. It is more advisable environmentally to give special consideration to the retention of the natural areas than it is to give special consideration to draining them.

On page 12, the statement "Blacktail Creek supports a good trout population and is relatively accessible to youngsters and adults who desire fishing close to town" should be added to Section D.

After discussion with game division personnel, we believe the last sentence on page 12 concerning effects on migratory waterfowl should be deleted.

On page 16, we understand that large trees have excellent capability for dampening sounds of traffic. We believe removal of large trees in the immediate vicinity of the hospital would probably have the undesirable effect of increasing noise levels in the immediate hospital area. This is an off-the-cuff suggestion since we are admittedly not versed in the intricacies of noise pollution.

The discussion of channel change on page 17 may be unnecessary due to project plan revision.

On page 18 the "unavoidable" channel change should be deleted, as previously explained.

On page 19, Section D, we believe the immediate area of the project also receives a significantly high amount of recreational use, in addition to agricultural use.

On page 20, we note references to compliance with existing laws concerning air and water pollution. We believe additional detail on how compliance will be accomplished should be added. If the subject of enforcing compliance is a means to minimize environmental damage, we believe the procedures for penalties which in fact enable enforcement should be discussed.

We thank you for the opportunity to review and comment on this project.

Sincerely,

Wesley R. Woodgerd
State Fish and Game Director

Ralph W. Boland

By: Ralph W. Boland, Assistant Administrator
Environment and Information Division

cc: Fletcher Newby
Norm Peterson
H. N. Stewart
LeRoy Ellig
Attn: Bud Gaffney

Date Recd. Preconst. 10-3-73

Act	Info	MAIL ROUTE	Attach	Initial
		30		
		30 Photogrammetry		
		30 Surfacing Design		
		30 Environmental		
		31 Contract Plans		
		32 Loc. - Road Design		
		33 Eng. Specialties		
		34 Hydraulic		
		36 Traffic		
	✓	37 Pub. Hearing		
		38 Sec. - Urban		
	✓	39 Consultant Design		
	✓	File		

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DEPARTMENT OF TRANSPORTATION

OFFICE OF THE SECRETARY

DATE: SEP 18 1973

In reply refer to: TES-70

SUBJECT: Draft Environmental Impact Statement: Highway Project I-15-1(5)51 Dillon South and F-241(20) Dillon I. Connection, Montana (FHWA-Mont-EIS-73-05-D)

FROM : Director, Office of Environmental Affairs

TO Harold N. Stewart
Division Engineer
Helena, Montana

We appreciate the opportunity to review and comment on this draft environmental impact statement. We have no specific comments to offer on the statement.

We look forward to receiving the final environmental impact statement, including the comments received from other public agencies and the general public on the draft statement.

M Convisser
Martin Convisser

cc:
Regional Federal Highway Administrator
Denver, Colorado

Date Recd. Preconst. 9-28-73

Act	Info	MAIL ROUTE	Attach.	Initial
		30		
		30 Photogrammetry		
		30 Surfacing Design		
		30 Environmental	+	
		31 Contract Plans		
		32 Loc. - Road Design		
		33 Eng. Specialties		
		34 Hydraulic		
		36 Traffic		
	✓	37 Pub. Hearing		
		38 Sec. - Urban		
	✓	39 Consultant Design		
+				
	✓	File		

Act	Inf		
	✓	DIV ENGR	
	✓	ENG COORD	✓
		ASST ENG-CO	
		ADM MGR	
		FIN SPEC	
		PNR ENGR	
	✓	RW OFFICER	
		STR ENGR	
	✓	DIST ENGR-A	4
		AREA A-1	
	✓	AREA A-2	✓
		AREA A-3	
		DIST ENGR-B	✓
		AREA B-1	
		AREA B-2	
		AREA B-3	
		ASST AREA	
		DF SUPV	
		AUDITORS	
		PRO CONT	
	L	[illegible]	✓

STATE OF MONTANA
Environmental Quality Council
FLETCHER NEWBY
EXECUTIVE DIRECTOR
CAPITOL STATION HELENA MT. 59601

MONTANA HIGHWAY COMMISSION
HELENA

August 17, 1973

Mr. H. J. Anderson
Director
Department of Highways
Helena, Montana 59601

Attention: Mr. Stephen C. Kologi

Dear Mr. Anderson:

This will acknowledge receipt of the Draft Environmental Statement for I 15-1(5)51 Dillon South and F 241(20) Dillon I. Connection.

We will accept this Draft Statement pending any further expression of public interest.

Sincerely yours,

Loren L. Bahls

LOREN L. BAHLS, Ph.D.
Acting Director

LLB/cjb

Date Recd. Precont. 8-17-73
Initial
Attach
Mail. ROUTE
Info
Act

MONTANA HIGHWAY COMMISSION
RECEIVED
SEP 27 1973
HELENA, MONTANA

STATE OF MONTANA
[illegible]MENT OF INT[illegible]ENTAL RELATIONS

AERONAUTICS DIVISION
OFFICES ON AIRPORT ROAD, HELENA
MAIL TO CAPITOL STATION, HELENA, MT 59601

406 449-2506

THOMAS L. JUDGE
GOVERNOR

SPECIALIZED SERVICES
ACCOUNTING
DATA PROCESSING
PLANNING & RESEARCH
ENGINEERING
PRECON SECTION
RIGHT OF WAY
CROSS VER
LEGAL
MAINTENANCE
MOTOR POOL
PERSONNEL
OTHER

September 26, 1973

Department of Highways
Sixth and Roberts
Helena, Montana 59601

Attention Steven C. Kologi, P.E.
Supervisor
Preconstruction Section

Dear Mr. Kologi:

Re: I 15-1 (5) 51 Dillon South
F 241 (20) Primary Connection

The Division of Aeronautics has reviewed the above mentioned project and it is our opinion that the construction of this project will not affect the aeronautical activities in this area. We have no knowledge that this project will adversely affect the environment. Thank you for the opportunity to review this project.

Sincerely yours,

William E. Hunt, Administrator
Division of Aeronautics

Vernon L. Moody

Vernon L. Moody, Chief
Airport Operations Bureau

Date Recd. Preconst. 9-27-73

Act	Info	MAIL ROUTE	Attach	Initial
		30		
		30 Photogrammetry		
		30 Surfacing Design		
		30 Environmental		
		31 Contract Plans		
		32 Loc. - Road Design		
		33 Eng. Specialties		
		34 Hydraulic		
		36 Traffic		
		37 Pub. Hearing		
		38 Sec. - Urban		
	✓	39 Consultant Design		
	✓	File		

DEPARTMENT OF
FISH AND GAME

Helena, Montana
November 13, 1973

Re: 39-JGS

Mr. Stephen C. Kologi, P.E.
Supervisor - Preconstruction Section
Montana Department of Highways
State Highway Building
Helena, Montana 59601

Dear Mr. Kologi:

As per your request, we have reviewed the draft environmental statements for the following interstate highway projects south of Dillon, Montana: F 241(20), I 15-1(5)51, I 15-1(32)37, I 15-1(31)46, I 15-1(36)51.

Presently, there are no historic sites within the project area listed on the National Register of Historic Places. There are several sites, however, within and adjacent to the project area which are listed in the Montana State Historic Preservation Plan and several sites which are not listed. The Vanderburgh Site, scene of an 1832 trapper-Indian battle, is listed in the Preservation Plan and located in the vicinity of Sections 8, 9, 16, 17; T8S, R9W. No visible evidence exists at this site and the impact of the highway project would be only a continuation of the alteration of the general environment which began long ago. Also listed in the Preservation Plan is the Montana-Utah Trail, an early freight route of the 1860's, paralleling virtually the entire length of the projects. The exact location or amount of visible remains of this wagon road is undetermined at present, but the project section within the narrow Clark Canyon area will undoubtedly obliterate more of the trail if indeed any of its remains escaped previous railroad and highway projects. The Lewis and Clark Expedition's Camp Fortunate, also listed in the Plan, is now unfortunately under the waters of Clark Canyon Reservoir.

Historic sites not listed in the State Preservation Plan include the Lewis and Clark Expedition route and four campsites. No visible evidence of course remains; however, the highway project will further degrade the historic environment of the expedition route, especially in the narrow Clark Canyon area. Rattlesnake Cliffs, immediately west of Barrett's Dam, is an important landmark named by the Lewis and Clark Expedition. The highway project will also have an impact on the historic environment here, especially if the highway or right-of-way encroaches on the base of the rock formation.

Mr. Stephen C. Kologi
Page Two
November 13, 1973

The Director of the Statewide Archeological Survey has indicated that the Clark Canyon Rock Shelters (24 BE 1005) near station 867+00 may contain important prehistoric cultural materials. The highway project environmental statement does not state their exact location in relation to project activities. If any of these activities would unavoidably alter the site, I strongly recommend that it be completely excavated and interpreted before highway construction is begun.

In summary, the impacts of the highway project on historic resources will be negligible except in the Clark Canyon area where impacts are potentially great, but can be minimized if highway width is minimized and landscape features retained.

To assist in future correspondence with us concerning historic preservation, I am enclosing some guidelines recently drafted to clarify the assistance that we may be able to provide.

Thank you for contacting us.

Sincerely,

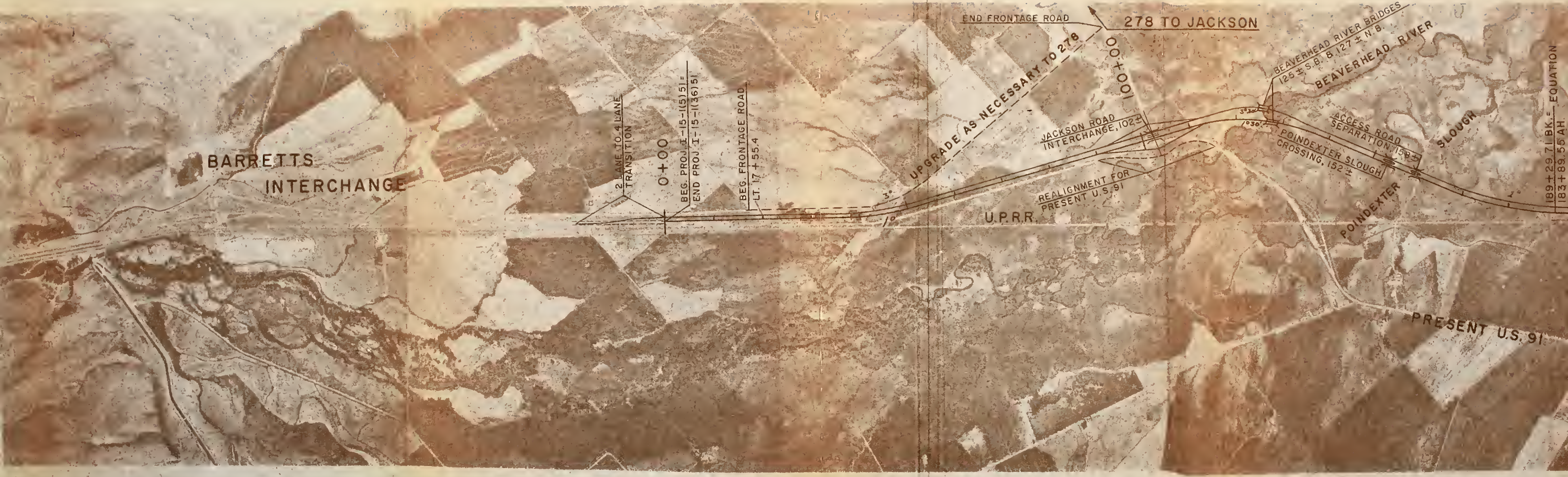
Ashley C. Roberts

Ashley C. Roberts
State Historic Preservation Officer

ACR/[illegible]
Enclosures

Date Recd. Preconst. 11-14-73

Act	Info	MAIL ROUTE	Attach	Initial
		28		
		29 Photogrammetry		
		29 Building Design		
		30 Environmental		
		31 Contract Plans		
		32 Sec. - Road Design		
		33 Eng. Specialties		
		34 Hydraulic		
		36 Traffic		
	✓	37 Pub. Hearing	✓	
		38 St. - Urban		
✓		39 Consultant Design	✓	
	✓	File	✓	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BEG. FRONTAGE ROAD LT. 17+55.4
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END FRONTAGE ROAD
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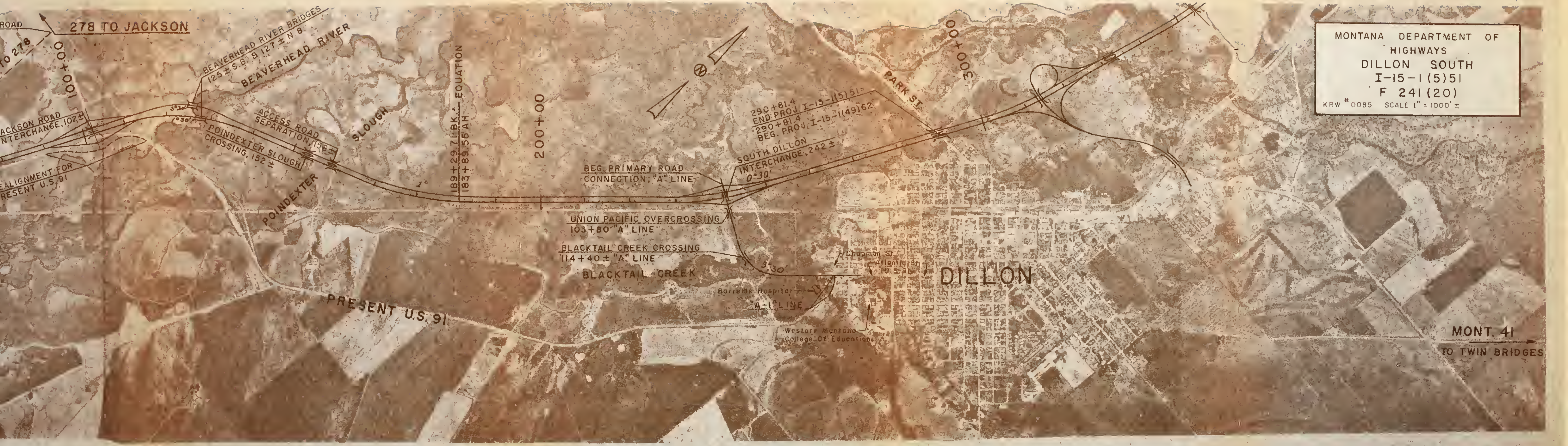
BEAVERHEAD RIVER BRIDGES 125± S.B. & 127± N.B.
BEAVERHEAD RIVER
ACCESS ROAD SEPARATION, 158±
POINDEXTER SLOUGH CROSSING, 152±
SLOUGH
POINDEXTER
1°
189+29.71 BK. = 183+89.55 AH. EQUATION
PRESENT U.S. 91


MONTANA DEPARTMENT OF
HIGHWAYS
DILLON SOUTH
I-15-1(5)51
F 241(20)
KRW # 0085 SCALE 1" = 1000' ±
ROAD
278 TO JACKSON
TO 278
100+00
ACKSON ROAD
NTERCHANGE, 102±
EALIGNMENT FOR
RESENT U.S. 91
BEAVERHEAD RIVER BRIDGES
125 ± S.B. & 127 ± N.B.
BEAVERHEAD RIVER
3°30'
1°30'
POINDEXTER SLOUGH
CROSSING, 152 ±
ACCESS ROAD
SEPARATION, 158 ±
SLOUGH
POINDEXTER
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189+29.71 BK. =
183+89.55 AH EQUATION
N
200+00
BEG. PRIMARY ROAD
CONNECTION, "A" LINE
UNION PACIFIC OVERCROSSING
103+80 "A" LINE
BLACKTAIL CREEK CROSSING
114+40 ± "A" LINE
BLACKTAIL CREEK
PRESENT U.S. 91
5°30'
Barretts Hospital
"A-1" LINE
Chapman St.
Atlantic St.
U.S. 91
Western Montana
College Of Education
290+81.4
END PROJ. I-15-1(5)51 =
290+81.4
BEG. PROJ. I-15-1(49)62
SOUTH DILLON
INTERCHANGE, 242 ±
0°30'
PARK ST.
300+00
DILLON
MONT. 41
TO TWIN BRIDGES

THE GREAT SEAL OF THE STATE OF MONTANA
ORO Y PLATA